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Attorneys for Plaintiffs,

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IO GROUP, INC., a California corporation,  
CHANNEL ONE RELEASING, Inc., a  
California corporation and LIBERTY  
MEDIA HOLDINGS, LLC., a California  
corporation,

Plaintiffs,

vs.

GLBT, Ltd., a British limited company,  
MASH and NEW, Ltd., a British limited  
company, PORT 80, Ltd., a company of  
unknown origin or structure, STEVEN  
JOHN COMPTON, an individual living in  
the United Kingdom, and DAVID  
GRAHAM COMPTON, an individual  
living in the United Kingdom.

Defendants.

)  
) **CASE NO.: C-10-1282 (MMC)**  
)  
) **DECLARATION OF MARC J. RANDAZZA**  
) **IN SUPPORT OF AWARD OF FEES**  
) **RELATING TO PLAINTIFFS MOTION FOR**  
) **TERMINATING SANCTIONS**

1 I, MARC RANDAZZA, declare under penalty of perjury that:

2 1. I am over the age of 18 and am a resident of the State of Nevada.

3 2. I have personal knowledge of the facts herein, and if called as a witness, could  
4 testify competently thereto.

5 3. I represent Plaintiff, Liberty Media Holdings, LLC, in Las Vegas, Nevada.

6 4. I have built a reputation and career on my specific experiences relating to litigation  
7 involving copyright infringement via the Internet and have specific qualifications relating to such  
8 litigations.

9 5. I received my Juris Doctor from the Georgetown University Law Center with  
10 *summa cum laude* honors.

11 6. Since receiving my degree, I have taught classes at the University of Florida and  
12 the Barry University School of Law.

13 7. I am admitted to practice in Massachusetts, Florida, California and Arizona, with  
14 an application in Nevada currently pending. I am admitted to practice before a dozen United  
15 States District Courts, four Courts in the Circuit of Appeals and the United States Supreme Court.

16 8. I have been a practicing attorney for over ten years and served as a partner at my  
17 previous firm before taking my current position as managing partner of the Randazza Legal  
18 Group.

19 9. I am a member of the First Amendment Lawyers Association and have been  
20 engaged by the organization on numerous occasions for speaking engagements.

21 10. Seven articles I have authored have been published in law review and bar journal  
22 publications. I have also made numerous television and radio guest appearances and been quoted  
23 many times in articles dealing with my particular area of legal expertise.  
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**HOURS RE MOTION FOR SANCTIONS/SPOLIATION**

DATE	HOURS	DESCRIPTION OF WORK
6/25/2011	3.40	Review of case law involving sanctions and other research into sanctions; Calls and emails with co-counsel and opposing counsel regarding potential for sanctions.
6/26/2011	3.30	Reviewing legal arguments put forth by opposing legal counsel and strategizing with co-counsel to determine proper courses regarding sanctions; Examining law and evidence with respect to sanctions.
6/26/2011	3.10	Receipt and review of motion for sanction draft; Drafting new sections for the motion and continuing research for said new sections.
7/5/2011	1.40	Telephone calls with co-counsel to discuss research, remedies and strategies relating to the motion for sanctions; Reviewing and editing content provided by co-counsel for motion.
7/6/2011	1.40	Final drafting of motion for sanctions; Calls with co-counsel to finalize details in motion.
7/7/2011	0.50	Review of documents filed with the court; Research concerning the termination of sanctions and lesser potentials for sanctions in preparation for reply briefing.
7/27/2011	3.40	Collaborating with co-counsel on finalizing reply briefing regarding sanctions; Research regarding judicial notice and U.K. legal standards.
8/2/2011	4.00	Drafting and editing reply briefing; exchanging drafts with co-counsel and discussing drafts and strategy.